



***City of Irving Response to
FCC Public Notice: PS Docket No. 12-94
Transition Process for 700 MHZ Public Safety Broadband Waiver Recipients***

Comment Submission Date: April 20, 2012

On April 6, 2012 FCC released a Public Notice requesting comments pertaining to the Transition Process for 700 MHZ Public Safety Broadband Waiver Recipients related to transition of the PSST spectrum to First Net. The City of Irving has been working on the design/ RFP/ deployment for a citywide wireless infrastructure since 2006. The deployment of our City Wide Communication System consists of a new P25 Radio Communications system, an LTE network and a fiber optic backbone. In this design the LTE network will utilize infrastructure that will be used for multiple systems so that cost and bandwidth efficiencies are achieved.

The convergence or consolidation of the communications infrastructure will provide

- 1. Reduce Cost of Total System.**
- 2. Best Access Solution / Location/ Bandwidth**
- 3. Reduce Management Total Cost of Ownership.**
- 4. Reduce Security Holes.**
- 5. Increase Efficiency/Productivity.**
- 6. Boost Workforce Effectiveness.**
- 7. Application Demand – Voice/Data/Video Multimodality.**
- 8. Reduce Chances of Failure.**
- 9. Reduced Number of Devices Carry.**
- 10. Provides opportunities for System sharing through multiple agencies and jurisdictions**

Question Responses:

We seek comment on the most expedient and cost-effective way to transition the Waiver Recipients' authorizations. What actions should the Commission take to effectuate the transition?

The Commission should take the necessary actions to provide waiver recipients the permission and/ or authority to continue the deployment of their respective networks based on the requirements previously outlined by the Commission.

Should the Commission issue a stay to halt deployment by the Waiver Recipients in order to avoid additional costs being incurred by the Waiver Recipients?

The Commission should NOT halt the deployment by the waiver recipients. The City of Irving has made substantial investments through staff's time, system design, supporting infrastructure, equipment purchases, and the city has begun the deployment of the network.

It appears that jurisdictions such as Charlotte and Texas that plan to go into service in the coming months may be differently situated than other Waiver Recipients because their deployments will bring public safety benefits in the very near term. Should these parties be treated differently because they plan to enter into service shortly, or because they have already expended substantial funds?

As stated above, we believe the Commission should allow all jurisdictions to continue their deployments. However, we believe the Commission should allow jurisdictions to proceed which have made substantial investments in support of the FirstNet.

Alternatively, should the Commission decline to act on the interoperability showings for Charlotte, Texas or Adams County, because of the impending transition?

No, the Commission should approve the interoperability showings based upon the orders in effect at that time.

What would be the impact to FirstNet if the Commission did authorize these waiver recipients to enter into service?

When the Commission authorizes waiver recipients to enter into service the City of Irving will provide the public safety users the following services:

- **Planned Advanced Data Applications** – Providing services such as: Real-time Digital In-car video, In-building GPS tracking, School / Public area video surveillance, Real-time Warrant Statuses, In-vehicle Suspect Mug shot/BOLOs
- **In-vehicle Enhanced Business Intelligence Application** – Providing real-time intelligence to officers in the field for their beat and surrounding areas, which provides highly detailed situational awareness allowing them to be much more effective. This application will also provide real-time support of fire personnel for water pressure from SCADA system.

- **City-Owned Asset – Internal Management / Control** – Increased Bandwidth for future application which current infrastructure will not support, Security Management, Interoperability with DFW municipalities, counties, and state and federal government agencies, Quality of Service, and Application Management.
- **Service Enhancements** - Enhanced safety and security, Improved government productivity, Economic development, Digital inclusion, Improved services to citizen, Intelligent transport, Traffic management, Remote management-public utilities, Emergency response, Interagency communications, Lower telecommunication costs

One possible approach would be to rescind all of the waiver authorizations. What would the impact include cost be to the Waiver Recipients of such an approach?

At this time, the City of Irving has expended more than **6+ million dollars** in equipment and supporting infrastructure to support this network. The cost above does not include the efficiency and time savings that would be achieved through the deployment of this network.

Could the cost impact be minimized in any way? For instance, could we rescind the waiver authorizations of only those jurisdictions who have not yet expended significant funds? Is there another method to achieve the same objectives, while minimizing any adverse impacts?

The Commission could work directly with the waiver recipients to help ensure that risks are mitigated. This could be achieved through technical or advisory committees.

We also recognize that the initial term of the May 2010 Waiver Recipients' leases will end in September 2012, shortly after the August 20, 2012 deadline for establishing the FirstNet board. Is there an appropriate way to transition their authorizations coincident with the end of the lease term or coincident with the issuance of a license to FirstNet? Is such an approach consistent with the Spectrum Act?

Based on the FCC's normal practices, the license spectrum would be transferred to the waiver recipients. We would request that the Commission would not deviate from the standard practice.

Should the Commission simply allow these leases to expire or decline to renew them?

The Commission should NOT allow the leases to expire. The Commission should; at a minimum allow recipients to continue under the current basis. Other mechanisms could be utilized to either extend or renewal of the frequencies until the FirstNet board is developed and is in a position to act.

Should the Commission allow renewal at the option of FirstNet? Should the Commission allow all or some of the leases to be renewed with the PSST, and then transferred to FirstNet at an appropriate time? Should such lease renewal terms be for a more limited duration than the initial two-year lease? What term?

Due to the long term commitments that the City of Irving has made, we would request that the initial lease duration be a minimum of two years.